

**REMARKS**

Claims 1-20 are pending in this application. By this Amendment, claims 1-3 and 11-13 are amended to recite features supported in the specification on page 10, line 22 to page 11, line 27, and claims 5, 7, 15 and 17 are amended to correct minor informalities. No new matter is added by any of these amendments.

Applicant appreciates the courtesies extended to Applicant's representative by Examiners Ebrahimi-Dehkordy and Wallerson during the September 14, 2004 interview. In accordance with MPEP §713.04, the points discussed during the interview are incorporated in the remarks below and constitute Applicant's record of the interview.

Reconsideration based on the following remarks is respectfully requested.

**I. Claims 1-20 Define Patentable Subject Matter**

The Office Action rejects claims 1-20 under 35 U.S.C. §102(e) over U.S. Patent 6,042,211 to Hudson *et al.* (hereinafter "Hudson"). This rejection is respectfully traversed.

A claim must be literally disclosed for a proper rejection under §102. This requirement is satisfied "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See MPEP §2131. Applicant asserts that the Office Action fails to satisfy this requirement with Hudson.

Hudson does not teach or suggest a method for forming an image including inputting image data representing an image to produce an input level for each pixel of a plurality of pixels that reproduce the image by a plurality of print elements, mapping from the input level to a mapping level for each pixel, determining drop assignment values for the pixel from the mapping levels to provide a multi-level output value that assigns none, one or more than one of the print elements corresponding to the pixel, the drop assignment values corresponding to their respective print elements, and forming a reproduced image based on the plurality of pixels and the determined drop assignment values, wherein the drop assignment values overlap in accordance with the multi-level output value, as recited in claim 1.

Also, Hudson fails to teach or suggest an image processing device including an image data input device that inputs image data representing an image to produce an input level for each pixel of a plurality of pixels that reproduce the image by a plurality of print elements, a mapping circuit that maps the pixel from the input level to mapping levels; a drop assignment determination circuit that determines drop assignment values for the pixel from the mapping levels to provide a multi-level output value that assigns none, one or more than one of the print elements corresponding to the pixel, the drop assignment values corresponding to their respective print elements, and an imager that forms a reproduced image based on the plurality of pixels and the determined drop assignment values, wherein the drop assignment values overlap in accordance with the multi-level output value, as recited in claim 11.

Hudson discloses an ink drop variance compensation technique. In particular, Hudson teaches translation by a converter 18 from RGB pixel signals generated by a computer 10 and displayed on a screen monitor 11 to CMYK tone values for a printer 12. Hudson teaches a color-mapping table 24 to convert from the RGB values to the CMYK values for the corresponding resolution. Hudson also teaches a compensation algorithm 26 to modify the CMYK values to adjust ink drop volume, as well as a color mapping table for ink volume. See col. 3, lines 31-51, col. 4, lines 14-41, col. 6, lines 16-26 and Figs. 3, 4 and 6 of Hudson. There is no teaching or suggestion in Hudson of providing a multi-level output value that assigns none, one or more than one of the print elements corresponding to the pixel, as recited in the claims. Thus, Hudson does not anticipate all of Applicant's claimed features.

During the personal interview, Applicant's representative asserted that Hudson fails to teach or suggest pixel mapping for multiple levels as claimed. Examiner Ebrahimi-Dehkordy indicated that the claimed features would be further considered in view of the teachings of Hudson, in addition to continued search.

For at least these reasons, Applicant respectfully asserts that the independent claims are now patentable over the applied reference. The dependent claims are likewise patentable over the applied reference for at least the reasons discussed, as well as for the additional features they recite. Consequently, all the claims are in condition for allowance. Thus, Applicant respectfully requests that the rejection under 35 U.S.C. §102 be withdrawn.

## II. Conclusion

In view of the foregoing, Applicant respectfully submits that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further is desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,



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Date: September 17, 2004

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